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12 UNITED STATES DISTRICT COURT
13 DISTRICT OF ARIZONA

14 Maria Cosme-Santos,

15 Plaintiff,

16 v.

17 Corizon Health, Inc.,

18 Defendant.

No. 2:15-cv-02072-PHX-DGC

**JOINT MOTION FOR APPROVAL
OF SETTLEMENT AGREEMENT
AND ORDER FOR DISMISSAL OF
CLAIMS WITH PREJUDICE**

19 The above-captioned lawsuit, which includes claims alleging violations of the Fair
20 Labor Standards Act (“FLSA”), has been settled. Defendant Corizon Health, Inc.
21 (“Corizon” or Defendant” and Maria Cosme-Santos (“Plaintiff”) (collectively “the
22 Parties”) respectfully move the Court to: (1) approve the Confidential Settlement
23 Agreement (“Agreement”) that is being submitted to the Court for *in camera* review and
24 approval.; and (2) enter an Order dismissing with prejudice the above-captioned matter.
25 The parties respectfully submit that this motion should be granted because the proposed
26 Agreement represents a fair and reasonable resolution of a bona fide dispute.

27 In support of this Joint Motion, the Parties state as follows.
28

1. Plaintiff and Defendant have reached an agreement to fully and finally settle all of Plaintiff's claims against Defendant and related persons and entities.

2. The terms of that agreement have been reduced to a written Confidential Settlement Agreement.

3. The Parties respectfully submit that this Joint Motion should be granted because the Agreement represents a fair and reasonable resolution of the parties' dispute, which includes whether Plaintiff was employed in a position exempt from the overtime requirements of the FLSA and whether back wages are due and owing.

4. Accordingly, the Parties stipulate that the Agreement represents a fair and reasonable resolution of a bona fide dispute and request the Court to review the Agreement *in camera*, approve it, and dismiss all claims in this action with prejudice, each party to bear its own costs and attorneys' fees as set forth in the Agreement.

RESPECTFULLY SUBMITTED this 28th day of March, 2016.

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